

UNITED STATES DISTRICT COURT

for the

_____ District of _____

FILED

Apr 10, 2025

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

United States of America

v.

Case No. **1:25-mj-00038-SKO**

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of _____ in the county of _____ in the

_____ District of _____, the defendant(s) violated:

Code Section

Offense Description

This criminal complaint is based on these facts:

☐ Continued on the attached sheet.

Complainant's signature

Printed name and title

Sworn to before me and signed in my presence.

Date: 4/10/2025

Judge's signature

Printed name and title

City and state: _____

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Jacob Ricks, being first duly sworn, hereby depose and state as follows:

I. INTRODUCTION

A. Purpose of the Affidavit

1. This affidavit is made in support of an application for a criminal complaint and arrest warrant for **Binghui Liu**, for violations of 18 U.S.C. § 1956 and 1957 – money laundering and conspiracy to commit money laundering. Based on my training and experience and the facts set forth in this affidavit, there is probable cause to believe that **Liu** conspired to commit money laundering in violation of Title 18, United States Code, Sections 1956 and 1957.

B. Affiant's Background

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) assigned to the FBI’s Sacramento Field Office. I have been a Special Agent with the FBI since 2022. I am responsible for investigations involving complex financial crimes. I have gained experience through previous complex financial investigations and through training, classes, and conferences.

2. I am an “investigative or law enforcement officer” within the meaning of 18 U.S.C. § 2150; that is, an officer of the United States of America who is empowered to investigate and make arrests for offenses alleged in this warrant. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

C. Government Impersonation Scam Background.

3. Based on my training and experience, and discussions with other agents familiar with the topic, I am familiar with “government impersonation scam” (“GIS”) schemes targeting elder individuals.

4. GIS is a type of fraud where a person posing as a government employee contacts a victim (typically an elderly individual) and falsely claims the victim’s account has been compromised in some way or threatens the victim with arrest. The purported government employee informs the victim that they must provide and move their funds to a third-party or government account to keep their funds safe. The purported government employee then coordinates the transfer of the victim’s funds to other GIS participants without the victim’s knowledge or consent.

1 **II. APPLICABLE LAW**

2 5. Title 18, United States Code, Section 1957 prohibits a person from knowingly engaging or
3 attempting to engage in a monetary transaction in criminally derived property of a value greater than
4 \$10,000 and is derived from specified unlawful activity. 18 U.S.C. § 1957.

5 6. Title 18, United States Code, Section 1956(h) states that, any person who conspires to
6 commit any offense defined in this section or section 1957 shall be subject to the same penalties as those
7 prescribed for the offense the commission of which was the object of the conspiracy.

8 **III. SUMMARY OF PROBABLE CAUSE**

9 7. On April 9, 2025, FBI agents coordinated a sting operation involving a group of individuals
10 and their scheme to defraud an elderly Victim. Since February 2024, the unknown individuals in the fraud
11 scheme misrepresented themselves as federal law enforcement and falsely claimed that the Victim's
12 identity has been compromised by criminals and warrants have been issued against her. On several
13 occasions, members of the conspiracy have arrived at D.S.'s residence, given a code word and/or displayed
14 a photo of the Victim, and taken illegal funds to an unknown location. The FBI set up a sting operation
15 where members of the conspiracy anticipated picking up \$20,000 in a package from the Victim's
16 residence, consistent with prior pick-ups. On April 9, 2025, the Victim coordinated over the phone with a
17 co-conspirator who gave her the passcode "1002M" and told her a law enforcement officer would arrive
18 soon to pick up the money. **Binghui LIU** arrived at the time and place of the pick-up. He approached the
19 Victim and gave her the code word "1002M." He then took the package containing the presumed \$20,000
20 and a tracker. Investigators followed **LIU** to a gas station where they saw him throw away the package
21 and keep the \$20,000.

22 8. Therefore, there is probable cause to arrest **LIU** for conspiring to commit money
23 laundering under 18 U.S.C. §§ 1956 and 1957.

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IV. **PROBABLE CAUSE**

A. **Background of Victim and Scammers' Modus Operandi for Taking the Victim's Funds.**

1. **A Victim's Son Reported a Fraud Against His Mother to the FBI.**

9. On or around March 16, 2025, an individual (hereinafter "the Reporting Party"), filed an online complaint with the FBI. The Reporting Party stated that elder fraud had been committed against his 75-year-old mother, D. S. (hereinafter "the Victim"), in Selma, California.

10. Later, FBI agents interviewed the Reporting Party. Approximately a year ago, the Reporting Party, as a co-signor on one of the Victim's bank accounts, received an alert by the bank that the Victim had been withdrawing large amounts of cash. The bank alerted the Reporting Party because they were concerned that the Victim was being scammed. The Reporting Party told the Victim he believed she was being scammed, but the Victim did not believe him. The Reporting Party and the Victim did not speak for almost a year after confronting the Victim.

11. On March 16, 2025, the Victim contacted the Reporting Party asking for \$20,000, which prompted the Reporting Party to file a complaint with the FBI.

2. **FBI Agents Interviewed the Victim, Who Discussed Losing Over \$780,000 to Individuals Likely Involved in a GIS.**

12. On March 18, 2025, the FBI interviewed the Victim. According to the Victim, someone contacted her claiming to be a U.S. Marshal approximately a year ago. The purported deputy marshal claimed that the Victim's name and social security number were being used by a drug cartel to commit money laundering, drug trafficking, human trafficking and other crimes. The scammers told the Victim that there was a federal arrest warrant for her and that they needed her help to clear her name. The Victim was told that all of her funds were going to be frozen by the government, but she could protect herself by providing all of her funds to the Federal Reserve.

13. As a result of this representation, the Victim withdrew funds in cash, as instructed, to give to what she believed were employees of the federal government. Due to the nature of the alleged arrest warrant, the Victim was coached to lie to employees of financial institutions in order to get her funds. From February 2024 to December 2024, the Victim liquidated her savings, investments, and even took out over \$200,000 in home mortgages. To date, the Victim's total loss is over \$788,000, with the vast

majority of that amount being withdrawn in cash.

14. The Victim provided cash to the scammers on over a dozen occasions. The scammers gave specific instructions on what the Victim needed to do. Once the Victim had withdrawn the cash, she was instructed to wrap it in tin foil, put it in a box, wrap the box in brown paper, write her name and address on the paper, and seal the paper in packing tape. The Victim had to send three photos to the scammers each time: first of the cash and the bank receipt showing cash withdrawals from the Victim's CitiBank bank account placed in front of the box; second with the cash wrapped in tin foil sitting in front of the box; and third of the final package. See Figure 1.

Figure 1: A Set of Photos that the Victim Sent to the Scammers in December 2024.



15. Once the package was ready, the scammers told the Victim that federal agents would pick up the package. Most of the time, the pick-ups occurred at the Victim's residence. The scammers would provide the Victim with a code word, which she would exchange with an unknown individual before handing them the package. Each pick-up was completed by a different individual, who typically had a photo of the Victim to confirm that she was the correct person.

16. In or around March 2025, the scammers contacted the Victim pretending to be from the Federal Reserve. The scammers told the Victim that the Federal Reserve would refund her money, plus additional money for her struggles, if she paid them an additional \$20,000. The Victim had no available funds, so she reached out to friends and family to try to come up with the \$20,000. One of the people the Victim reached out to was her son, the Reporting Party.

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B. FBI Agents Arrested Liu During Their Operation on April 9, 2025.

17. The Victim maintained contact with the scammers after the FBI interviewed her. On April 8, 2025, the Victim, under the FBI's direction, informed the scammers that she had obtained \$20,000 and it would be ready for pick-up on April 9, 2025. Fake U.S. currency owned by the FBI was used to take the three photographs required by the scammers with the intent to conduct a controlled delivery to the individual conducting the pick-up from the Victim's residence. See Figure 2. These photographs were consistent with prior pick-ups of the Victim's funds. The receipt showed a cash withdrawal of \$20,000 from the Victim's CitiBank bank account.

Figure 2: A Set of Photos that the Victim Sent to the Scammers on April 8, 2024.



18. On April 9, 2025, an unknown co-conspirator using the alias “Sebastian Roy,” contacted the Victim and informed her that an “officer” would be at her residence within a few hours to retrieve the \$20,000, and that the officer would confirm his identity to the Victim by providing the passcode of “1002M.” The Victim also provided the unknown co-conspirator with a description of her clothing and a photo, which was taken that day, so that the unknown person impersonating an officer would be able to recognize the Victim upon arrival.

19. Later, on April 9, 2025, an unknown individual, later identified as **Binghui LIU**, arrived at the Victim's residence driving a white Ram pickup truck, license plate 18367M3. **LIU** parked near the Victim's house, got out of his truck, and approached the Victim on foot. **LIU** introduced himself as “Jack” and provided the Victim with the passcode “1002M” that the co-conspirator “Sebastian Roy” provided to the Victim. The Victim then handed the package in Figure 2 to **LIU**. He then got back into his truck and left the residence. The package contained a tracker in order to monitor the package's location.

20. Federal and state law enforcement officers were at the Victim's residence during the exchange. Investigators saw LIU get into his truck and drive away. Investigators followed LIU to a Love's gas station at 3174 Avenue 17, Madera, California, 93638, where LIU stopped to get gas. While at the gas station, investigators saw LIU throw the package into a gas station trash can. Investigators then arrested LIU. Investigators found the fake \$20,000 inside LIU's truck's center console. Investigators saw LIU's phone on with a map app providing directions to a location in the bay area.

C. There is Probable Cause to Arrest LIU.

21. As described above, LIU drove to the Victim's house after the Victim had informed a co-conspirator that she had the \$20,000. The co-conspirator told the Victim that an officer would arrive at the Victim's house and give her a password of "1002M." The Victim also sent a picture of herself to confirm what she was wearing so the "officer" could identify her. LIU arrived at the Victim's house, walked up to her, and gave her the password "1002M." LIU took possession of the package and drove away. When he needed gas, he threw away the package in Figure 2 and kept the \$20,000.

22. The Victim sent photographs in Figure 2 to the co-conspirator. Those photographs showed the purported funds, the box it was placed in, and the bank receipt from the Victim's CitiBank bank account showing the cash withdrawal. The co-conspirators misrepresented to the Victim that a law enforcement officer would arrive to pick up the funds, and LIU arrived shortly after that conversation, walked up to the Victim and provided the agreed-upon password "1002M."

23. As stated above, co-conspirators have defrauded the Victim and illegally taken possession of over \$788,000 from her since February 2024 through several similar pickups of cash.

24. Therefore, there is probable cause that LIU conspired to commit money laundering in violation of 18 U.S.C. § 1956 and 1957.

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V. CONCLUSION

25. Based on the facts set forth above, there is probable cause that LIU conspired to commit money laundering and fraud, and the Court authorize the criminal complaint and issue an arrest warrant.


I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Respectfully submitted,


JACOB RICKS

Special Agent
Federal Bureau of Investigation

This Affidavit was submitted to me by email/pdf and attested to me as true and accurate by telephone, consistent with Fed. R. Crim. P. 4.1, and 41(d)(3) on 4/10/2025.



HON. SHEILA K. OBERTO
United States Magistrate Judge

Reviewed as to form.

/s/ Cody S. Chapple

CODY S. CHAPPLE
Assistant U.S. Attorney